

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. \_\_

**ORDER SUSTAINING DEBTORS' ONE HUNDRED EIGHTEENTH (SUBSTANTIVE)  
OMNIBUS OBJECTION TO CERTAIN DUPLICATE  
PROOFS OF CLAIMS (CUSTOMER CLAIMS)**

Upon the one hundred eighteenth omnibus objection (the “Objection”)<sup>2</sup> of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Duplicate Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Duplicate Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Duplicate Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.

4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover are preserved.

5. To the extent a response is filed regarding any Duplicate Claim, each such Duplicate Claim, and the Objection as it pertains to such Duplicate Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Duplicate Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication

or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware

\_\_\_\_\_  
The Honorable John T. Dorsey  
Chief United States Bankruptcy Judge

**SCHEDULE 1**

**Duplicate Portal Claims**

61483 - Surviving Claim was ordered modified on the Decisors: Twenty-Seventh (Substantive) Omnibus Collection to Certain Overstated Pivots of Claim (Customer Claims)

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[illegible]

5615\*: Surviving Claim is pending modification on the Debtors' Fiftyeth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims)

46220\*: Surviving Claim was adjoined on the Debtors' Seventh (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)

64183\*: Surviving Claim is pending modification on the Debtors- Fiftieth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims)

91255\*: Surviving Claim is pending modification on the Debtors' Forty-Ninth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer

47504\*: Surviving Claim is pending modification on the Debtors' Forty-Ninth (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)

16802\*: Surviving Claim is pending modification on the Debtors' Fiftieth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims)

580005\*: Surviving Claim is pending modification on the Debtors' Fiftieth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).

44972\*: Surviving Claim is pending modification on the Debtors' Fiftieth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims)

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
55829	Name on file	FTX EU Ltd.	COMP-PERP	0.0000000000000000	25269*	Name on file	FTX EU Ltd.	COMP-PERP	0.0000000000000000
			DOT-PERP	0.0000000000000021				DOT-PERP	0.0000000000000021
			EGLD-PERP	0.0000000000000003				EGLD-PERP	0.0000000000000003
			EOS-PERP	0.0000000000000010				EOS-PERP	0.0000000000000010
			ETH-PERP	0.0000000000000003				ETH-PERP	0.0000000000000003
			FLOW-PERP	0.0000000000000000				FLOW-PERP	0.0000000000000000
			FTM-PERP	0.0000000000000000				FTM-PERP	0.0000000000000000
			FTT	0.0477699200000000				FTT	0.0477699200000000
			FTT-PERP	0.0000000000000005				FTT-PERP	0.0000000000000005
			GALA-PERP	0.0000000000000000				GALA-PERP	0.0000000000000000
			GRIT-PERP	0.0000000000000000				GRIT-PERP	0.0000000000000000
			HBAR-PERP	0.0000000000000000				HBAR-PERP	0.0000000000000000
			ICOTA-PERP	0.0000000000000000				ICOTA-PERP	0.0000000000000000
			LRC-PERP	0.0000000000000000				LRC-PERP	0.0000000000000000
			LTC-PERP	0.0000000000000000				LTC-PERP	0.0000000000000000
			LUNC-PERP	0.0000000000000018				LUNC-PERP	0.0000000000000018
			MANA-PERP	0.0000000000000000				MANA-PERP	0.0000000000000000
			MATIC-PERP	0.0000000000000000				MATIC-PERP	0.0000000000000000
			MTL-PERP	0.0000000000000000				MTL-PERP	0.0000000000000000
			NEAR-PERP	0.0000000000000000				NEAR-PERP	0.0000000000000000
			OMG-PERP	0.0000000000000000				OMG-PERP	0.0000000000000000
			RUNE-PERP	0.0000000000000042				RUNE-PERP	0.0000000000000042
			SAND-PERP	0.0000000000000000				SAND-PERP	0.0000000000000000
			SNB-PERP	0.0000000000000000				SNB-PERP	0.0000000000000000
			SLP-PERP	0.0000000000000000				SLP-PERP	0.0000000000000000
			SOL-PERP	0.0000000000000000				SOL-PERP	0.0000000000000000
			TRX	0.0000640000000000				TRX	0.0000640000000000
			TRX-PERP	0.0000000000000000				TRX-PERP	0.0000000000000000
			USD	410.124027922064500				USD	410.124027922064500
			USDT	1,899.926300000000000				USDT	1,899.926300000000000
			VET-PERP	0.0000000000000000				VET-PERP	0.0000000000000000
			XEM-PERP	0.0000000000000000				XEM-PERP	0.0000000000000000
			XRP-PERP	0.0000000000000000				XRP-PERP	0.0000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which is pending modification on the Debtors' Fifteenth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).									
95829	Name on file	FTX EU Ltd.	ATLAS	81,762.343300000000000	25269*	Name on file	FTX EU Ltd.	ATLAS	81,762.343300000000000
			FTT	0.0795599700000000				FTT	0.0795599700000000
			POLIS	1,049.300595000000000				POLIS	1,049.300595000000000
			USD	0.374602571831125				USD	0.374602571831125
			USDT	0.008000008242937				USDT	0.008000008242937
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which is pending modification on the Debtors' Fifteenth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).									
96140	Name on file	FTX EU Ltd.	ATLAS	540,927.221913000000000	7527*	Name on file	FTX Trading Ltd.	ATLAS	540,927.221913000000000
			AVAX-PERP	0.0000000000000006				AVAX-PERP	0.0000000000000006
			BTC	0.000000000029916				BTC	0.000000000029916
			BTC-PERP	1.3780000000000000				BTC-PERP	1.3780000000000000
			CRV-PERP	0.0000000000000000				CRV-PERP	0.0000000000000000
			ETH	17.807171880000000				ETH	17.807171880000000
			ETH-PERP	0.0000000000000003				ETH-PERP	0.0000000000000004
			ETHW	15.820171880000000				ETHW	15.820171880000000
			EUR	0.000000142000799				EUR	0.000000142000800
			FTT	364.797891770000000				FTT	364.797891770000000
			GENE	475.600000000000000				GENE	475.600000000000000
			LINK	0.0457405100000000				LINK	0.0457405100000000
			LUNC-PERP	0.0000000000000007				LUNC-PERP	0.0000000000000007
			MAGIC	10,439.000000000000000				MAGIC	10,439.000000000000000
			RAY	501.410954000000000				RAY	501.410954000000000
			ROSE-PERP	3,301.000000000000000				ROSE-PERP	3,301.000000000000000
			RUNE	1,864.102012250000000				RUNE	1,864.102012250000000
			SNX	0.04644898116361				SNX	0.04644898116361
			SOL	0.0079257000000000				SOL	0.0079257000000000
			SOL-PERP	0.0000000000000000				SOL-PERP	0.0000000000000000
			SRM	9.10070172000000000				SRM	9.10070172000000000
			SRM_LOCKED	46.611779300000000				SRM_LOCKED	46.611779300000000
			STX-PERP	0.0000000000000000				STX-PERP	0.0000000000000000
			USD	41,128.880000000000000				USD	41,128.880000000000000
			USDT	0.003897159048001				USDT	0.003897159048002
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which is pending modification on the Debtors' Twenty-Seventh (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).									
87382	Name on file	FTX EU Ltd.	EUR	3,143.550000000000000	77941*	Name on file	FTX EU Ltd.	EUR	3,143.550000000000000
			XRP	3,543.000000000000000				XRP	3,543.000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which is pending modification on the Debtors' Fifteenth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).									
95574	Name on file	FTX EU Ltd.	BNB	0.0410315600000000	23532*	Name on file	FTX EU Ltd.	BNB	0.0410315600000000
			BTC	0.0064699600000000				BTC	0.0064699600000000
			FTT	17.375046970000000				FTT	17.375046970000000
			USDT	0.000001235249565				USDT	0.000001235249565
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which is pending modification on the Debtors' Fifteenth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).									
95640	Name on file	West Realm Shires Services Inc.	AKRO	1.0000000000000000	42121*	Name on file	FTX EU Ltd.	AKRO	1.0000000000000000
			BAD	4.0000000000000000				BAD	4.0000000000000000
			BAT	1.0021909100000000				BAT	1.0021909100000000
			CHZ	1.0000000000000000				CHZ	1.0000000000000000
			CRO	116.110602580000000				CRO	116.110602580000000
			DENT	1.0000000000000000				DENT	1.0000000000000000
			ETH	4.1126918900000000				ETH	4.1126918900000000
			ETHW	4.112280716673081				ETHW	4.112280716673081
			EUR	0.000000123146113				EUR	0.000000123146113
			GALA	1,711.586102590000000				GALA	1,711.586102590000000
			KIN	3.0000000000000000				KIN	3.0000000000000000
			MATH	1.0000000000000000				MATH	1.0000000000000000
			MATIC	0.0005410200000000				MATIC	0.0005410200000000
			RSR	1.0000000000000000				RSR	1.0000000000000000
			SAND	235.664689810000000				SAND	235.664689810000000
			SECO	0.0000007890000000				SECO	0.0000007890000000
			TRX	2.0000000000000000				TRX	2.0000000000000000
			UBXT	1.0000000000000000				UBXT	1.0000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which is pending modification on the Debtors' Fifteenth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).									
95600	Name on file	West Realm Shires Services Inc.	AKRO	1.0000000000000000	42121*	Name on file	FTX EU Ltd.	AKRO	1.0000000000000000
			BAD	4.0000000000000000				BAD	4.0000000000000000
			BAT	1.0021909100000000				BAT	1.0021909100000000
			CHZ	1.0000000000000000				CHZ	1.0000000000000000
			CRO	116.110602580000000				CRO	116.110602580000000
			DENT	1.0000000000000000				DENT	1.0000000000000000
			ETH	4.1126918900000000				ETH	4.1126918900000000
			ETHW	4.112280716673081				ETHW	4.112280716673081
			EUR	0.000000123146113				EUR	0.000000123146113
			GALA	1,711.586102590000000				GALA	1,711.586102590000000
			KIN	3.0000000000000000				KIN	3.0000000000000000
			MATH	1.0000000000000000				MATH	1.0000000000000000
			MATIC	0.0005410200000000				MATIC	0.0005410200000000
			RSR	1.0000000000000000				RSR	1.0000000000000000
			SAND	235.664689810000000				SAND	235.664689810000000
			SECO	0.0000007890000000				SECO	0.0000007890000000
			TRX	2.0000000000000000				TRX	2.0000000000000000
			UBXT	1.0000000000000000				UBXT	1.0000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which is pending modification on the Debtors' Fifteenth (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).									
93796	Name on file	FTX Trading Ltd.	BNB	0.025642093633994	36306*	Name on file	FTX Trading Ltd.	BNB	0.025642093633994
			ETH	0.000000008979951				ETH	0.000000008979951
			FTT	18.967959576000000				FTT	18.967959576000000
			TONCOIN	124.859353120000000				TONCOIN	124.859353120000000
			TONCOIN-PERP	0.0000000000000000				TONCOIN-PERP	0.0000000000000000
			USD	41.116472424167064				USD	41.116472424167064
			USDT	0.0000000000000000				USDT	0.0000000000000000
Reason: The claim to be disallowed is substantively duplicative of the surviving claim which is pending modification on the Debtors' Seventh (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims).									